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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

EMQORE ENVESECURE PRIVATE  
CAPITAL TRUST,

*Plaintiff,*

v.

BHAVDEEP SINGH, ET AL.,

*Defendants.*

Civil Action No. 2:20-CV-07324

**DECLARATION OF  
MADIS SONAJALG**

I, **MADIS SONAJALG**, being of full age, do hereby declare as follows:

1. I am the principal operating officer associated with Plaintiff Emqore Envesecure Capital Trust (“Plaintiff”), and in that role, have responsibility for Plaintiff’s commercial affairs. I am authorized to submit this Declaration on behalf of Plaintiff. The facts set forth herein are true to the best of my personal knowledge or based upon the documents maintained in Plaintiff’s business file in the ordinary course of business.

2. Plaintiff is in the process of finding counsel to substitute Mandelbaum Salsburg P.C. (“MS”). More importantly, plaintiff has been pursuing, and continues to pursue, retention of new counsel to represent Plaintiff in this matter.

3. However, those activities have been adversely affected over the last several weeks because individuals who are associated and/or employed by Plaintiff responsible for such vetting and interviewing of new counsel have been or are currently battling COVID-19.

4. Despite these setbacks, Plaintiff does believe it will be able to have new counsel formally appear on its behalf on or before March 15, 2021.

5. Accordingly, it is respectfully requested that the Court grant MS's motion to withdraw and give Plaintiff until March 15, 2021 to retain new counsel and have that counsel file the appropriate notice of appearance.

6. It is further respectfully requested that once new counsel formally appears on behalf of Plaintiff that a case management conference be scheduled to address numerous housekeeping items, including but not limited to setting a date for Plaintiff to file its oppositions to the pending motions to dismiss. (D.E. Nos. 25, 33 and 34).

I declare under penalty of perjury that the foregoing is true and correct.



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MADIS SONAJALG

Dated: February 2, 2021